EXHIBIT D

DECLARATION OF MARIA CARRETERO

I, Maria Carretero, under penalty of perjury, state based on personal knowledge that the following facts are true and correct:

1. I am over the age of 21 years

2. I currently reside in Chicago, Illinois.

3. I was employed with Gold Standard Baking, Inc. ("GSB") located at 3700 S. Kedzie Ave, Chicago, Illinois from approximately June 28, 1999 until July 15, 2014.

4. I began my employment with GSB as a packer. In that position and as a direct hire of GSB, I was represented by the union known as UNITE/HERE.

5. In or about September of 2009, I was promoted to a third shift supervisor for GSB. From approximately 2009 to 2011, I supervised both the Production Department and the Packaging Department on third shift. From approximately 2011 to 2014, I supervised just the Packaging Department because that department had grown.

6. In my capacity as third shift supervisor, I was responsible for overseeing lines of workers made up of both employees directly employed by GSB and with temporary laborers sent by Personnel Staffing Group, LLC d/b/a MVP ("MVP").

7. MVP had an Onsite Manager who worked at GSB. I would communicate the needs of GSB for laborers from MVP for my lines on the third shift.

8. Since I began working as a third shift supervisor, GSB has had a strong preference for Hispanic workers from MVP and a strong preference to not have African American laborers from MVP. This is well known throughout GSB.

9. Prior to 2013, almost no African American laborers worked at GSB or were assigned by MVP to work at GSB. As far as I know, there was only one African American

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mechanic employed directly by GSB. If MVP laborers were assigned, GSB supervisors would tell MVP Onsite Supervisors to DNR ("Do Not Return") them and to not send them back because we knew GSB did not want them at the factory. MVP complied with this request.

10.   At some point in 2013, GSB began to allow African Americans to work as dailies, temporary laborers who worked on a short-term assignment or on weekends. However, GSB did not want African Americans to work as regulars, laborers scheduled to work every day.
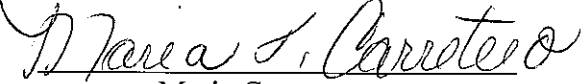
11.   It was common knowledge that GSB did not want to have African Americans at the factory. For example, in or about January 2014, there was a backup on one of the lines that I was supervising near the end of the shift. Alex Salgado, the GSB Plant Manager, came over and asked what was going on. There were mostly Hispanic laborers on the line but also some African American laborers. I explained that not everyone on the line knew how to do the job. Mr. Salgado yelled angrily in Spanish "Quitan esos negros" which is translated as "Get rid of all those black people." Mr. Salgado said this in front of me, and three other supervisors: Noe Rodriguez, Oscar Fernandez, and Cristina (last name unknown). At the end of the shift, all of the African American laborers were DNR'd and all of the Latinos were returned.

12.   I have heard other GSB supervisors call African Americans bad names and say they are worthless and lazy workers. For example, I have repeatedly heard Noe Rodriguez, Sanitation Supervisor, refer to African American laborers as "niggers" (in English) and say they were lazy and worthless, or words to that effect. I also heard Oscar Fernandez, another Department Supervisor refer to African American laborers as lazy, good-for-nothing "negros".

13.   Under the union contract, a temporary laborer can only work 90 days in a row or has to be made permanent. Therefore, we frequently have to replace the "regular" MVP laborers, those who are on the schedule for 40 hours in a week, with new laborers from MVP.

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I declared under penalty of perjury that the foregoing is true and correct.

Executed Dated: February 25, 2015

Maria Carretero

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I, _____, hereby certify, under penalty of perjury, that I am fluent in

Spanish and English and that I have translated the above document from English into Spanish to

the best of my abilities.

Dated: _2-25-2015_

Angelica Serna

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